

### **REMARKS**

Claims 42 to 63 remain active in this application of which claims 52 to 63 have been withdrawn from consideration.

Claims 42 to 51 were rejected under 35 U.S.C. 102(e) as being anticipated by Andresen et al (U.S. 6,147,538). The rejection is respectfully traversed.

Claim 42 requires, among other features, an electrostatic discharge device disposed in the substrate, the electrostatic discharge device being at least partially disposed beneath the bond pad. Contrary to the allegation in the Office action, no such features is taught or suggested by Andresen et al., a patent assigned to the assignee of the subject application and copending therewith. If the allegation of anticipation is maintained, it is respectfully requested that the examiner specifically show where in Andresen et al. there is a statement or a showing that the electrostatic discharge device is disposed at least partially beneath the bond pad as claimed and how each and every claim is readable on Andresen et al.. No such showing appears in the Office action.

In addition, claim 42 further requires an I/O buffer disposed in the substrate and connected to the bond pad for providing communication between the bond pad and the circuitry, the circuitry positioned substantially adjacent to both the electrostatic discharge device and the I/O buffer. No such features is taught or suggested by Andresen et al. in the combination as claimed.

Claims 43 to 51 depend from claim 42 and therefore define patentably over Andresen et al. for at least the reasons presented above with reference to claim 42.

Claim 46 further limits claim 42 by requiring that the I/O buffer be a complementary output buffer. No such feature is taught or suggested by Andresen et al. either alone or in the combination as claimed.

Claim 50 further limits claim 42 by requiring that the circuitry be a digital signal processor. No such feature is taught or suggested by Andresen et al. either alone or in the combination as claimed.

Claim 51 further limits claim 42 by requiring that the entire surface of the substrate beneath the bond pad be occupied by the electrostatic discharge device. No such feature is taught or suggested by Andresen et al. either alone or in the combination as claimed.

In view of the above remarks, favorable reconsideration and allowance are respectfully requested.

Respectfully submitted,



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